### Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

### Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a. Cluster GS-1 to GS-10 (PWD)

Answer No

b. Cluster GS-11 to SES (PWD)

Answer Yes

The U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,021 employees in Fiscal Year (FY) 2019. Analysis of the permanent workforce data contained in Table B-4 indicates that the percentage of PWD in the GS-11 to SES cluster was 11.03% in FY 2019, which falls below the benchmark. Analysis of the permanent workforce data contained in Table B-4 indicates that the percentage of PWD in the GS-1 to GS-10 cluster was 27% in FY 2019, which indicates that ICE does not have a trigger in the GS-1 to GS-10 cluster. Further analysis indicates that there are 10 Law Enforcement Officers and 99 non-Law Enforcement Officers who identified as PWDs in Cluster GS-1 to GS-10. Analysis of the available data indicates that 3.13% of the Cluster GS-10 in the ICE workforce are PWDs, which falls below the benchmark. Additional analysis of the MD-715 Data feed also indicates that Cluster GS-1 to GS-10 also falls below the benchmark for PWD in Law Enforcement Officers, who identified as PWDs in Cluster GS-11 to SES. Analysis of the available data indicates that 2.12% of the Cluster GS-11 to SES in the ICE workforce are PWDs, which falls below the benchmark. Analysis of the MD-715 Data feed also indicates that Cluster GS-11 to SES also falls below the benchmark for PWD in Law Enforcement positions. The physical requirements of the Law Enforcement positions at ICE has, and will continue to, prevent ICE from reaching the benchmark for GS-1 to GS-10 and the GS-11 to SES clusters.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a. Cluster GS-1 to GS-10 (PWTD)

Answer No

b. Cluster GS-11 to SES (PWTD)

Answer Yes

The ICE workforce consisted of 20,021 employees in FY 2019. Analysis of the permanent workforce data contained in Table B-4 indicates that the percentage of PWTD in the GS-11 to SES cluster was 0.90% in FY 2019, which falls below the benchmark. Analysis of the permanent workforce data contained in Table B-4 indicates that the percentage of PWTD in the GS-1 to GS-10 cluster was 3.21% in FY 2019, which indicates that ICE does not have a trigger in the GS-1 to GS-10 cluster. Further analysis indicates that there are 5 Law Enforcement Officers and 58 non-Law Enforcement Officers who identified as PWTDs in Cluster GS-1 to GS-10. Analysis of the available data indicates that 1.43% of the Cluster GS-1 to GS-10 in the ICE workforce are PWTDs,

which falls below the benchmark. Additional analysis of the MD-715 Data feed also indicates that Cluster GS-1 to GS-10 falls below the benchmark for PWTD in Law Enforcement positions. Additionally, the analysis indicates that there are 36 Law Enforcement Officers and 123 non-Law Enforcement Officers, who identified as PWTDs in Cluster GS-11 to SES. Analysis of the available data indicates that 1% of the Cluster GS-11 to SES in the ICE workforce are PWTDs, which falls below the benchmark. Analysis of the MD-715 data feed also indicates that Cluster GS-11 to SES falls below the benchmark for PWTD in Law Enforcement positions. The physical requirements of the Law Enforcement positions at ICE has, and will continue to, prevent ICE from reaching the benchmark for GS-1 to GS-10 and the GS-11 to SES clusters within the permanent workforce.

Grade Level Cluster(GS or Alternate Pay	Total	Reportable	Disability	Targeted Disability	
Planb)	#	#	%	#	%
Numarical Goal		12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

Information regarding the numerical goals is shared with hiring officials, managers, and recruiters during the ICE Office of Human Capital (OHC) training regarding special hiring authorities. Additionally, the annual EEO & Diversity Managers and Supervisors Update contains information regarding the numerical goals.

### Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

## A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

Answer No

During FY 2019 the Disability program staff consisted of a Disability Program Manager, one Reasonable Accommodation Coordinator, and a collateral duty Reasonable Accommodation Coordinator for 5 months. Furthermore, the Office of Diversity and Civil Rights (ODCR) awaits the onboarding of an additional RA coordinator who was selected during FY 2019. ODCR is also leveraging contractual staff to assist with data management, data analysis projects, and other projects in support of the Disability Program.

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

D. 170 B T. 1	# of FTE	Staff By Employme	ent Status	Responsible Official
Disability Program Task	Full Time	Part Time	Collateral Duty	(Name, Title, Office Email)
Processing applications from PWD and PWTD	2	0	0	Riza Takeda Office of Human resources Operations Center Team A – Staffing Branch Chief hrasstdro@ice.dhs.gov Ekron Tanwongprasert Office of human Resources Operations Center Team B – Acting Staffing Branch Chief DCS-HR- Staffing@ice.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	2	0	0	Lynn Dickson, Disability Program Manager, Lynn.M.Dickson@ice.dhs.§
Section 508 Compliance	1	0	0	Arva Parker, IT Specialist, ICE Section 508 Coordinator
Architectural Barriers Act Compliance	1	0	0	Lynn Dickson, Disability Program Manager
Processing reasonable accommodation requests from applicants and employees	4	0	2	Lynn Dickson, Disability Program Manager June – September 2018 Carmen Senior, Reasonable Accommodation Specialist
Special Emphasis Program for PWD and PWTD	1	0	0	Natasha Hewlett, Special Emphasis Program Manager

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If "yes", describe the training that disability program staff have received. If "no", describe the training planned for the upcoming year.

Answer Yes

ODCR has provided training for all Disability Program team members to bolster their knowledge and skills for responding to reasonable accommodation requests. During FY 2019, the disability program staff attended the EEOC Disability Program Manager (Basic) course. The Disability Program manager attended EEOC's 22nd Annual EXCEL Training Conference, the Federal Dispute Resolution (FDR) Training conference, and participated in Federal Exchange on Employment and Disability meetings. The reasonable accommodation coordinator attended the Americans with Disabilities Act Training, and the Federal Exchange on Employment and Disability training regarding Deaf and Hard of Hearing in the Federal workplace. Additionally, the Disability Program Manager provided on the job training for the reasonable accommodation coordinator.

#### B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer Yes

The ICE Central Accommodation Fund (CAF) was established in FY 2016 and remains in place. It continues to be sufficiently funded to meet the accommodation needs of ICE employees and applicants for employment. Additionally, the Disability Program receives support from our current contractors. The contractors assist with data management, data analysis projects, and other projects in support of the Disability Program.

Section III: Program Deficiencies In The Disability Program

FY 2019

Brief Description of Program
Deficiency

C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.

Objective			s requests within the timeframe set forth in ICE reasonable		
Target Date	Sep 30, 2020	n procedures.			
Completion Date	Sep 30, 2020				
Completion Date	Target Date	Completion Date	Planned Activity		
	Sep 30, 2019	Completion Date	Provide updated plan to senior staff for consideration.		
	Sep 30, 2019		Coordinate with the Contract Project Manager to facilitate the assignment of RA projects to available contractors.		
	Dec 31, 2019		Revise ODCR internal Standard Operating Procedure (SOP) and templates for processing RA requests to align with providing supervisors with decision making authority.		
Planned Activities	Feb 28, 2020		With the assistance of outside facilitators, the Diversity Management Division will engage in a series of process-mapping activities to identify weaknesses and undue delays in the RA process.		
	Mar 30, 2020		Initiate a plan to review the ICE Reasonable Accommodation procedures to gain internal efficiencies.		
	Apr 30, 2020		Update the ICE Reasonable Accommodation procedures in accordance with results from the process mapping.		
	Jun 30, 2020		Assess reasonable accommodation system requirements to identify bottlenecks and ascertain whether additional tracking mechanisms are required.		
	Sep 30, 2020		Review the current staffing plan and submit requests to fill vacant positions.		
	Sep 30, 2020		Provide training for managers, supervisors, and employees regarding the revised reasonable accommodation procedures.		
	<u>Fiscal Year</u>	Accomplishment			
Accomplishments	2019	Modification to Target Date: The number of RA cases processed timely in FY 2019 increased by 11 percent in comparison with FY 2018. While this is a noteworthy accomplishment, additional time and tasks are needed in order for the RA team to process all RA requests within the timeframes established in the ICE Reasonable Accommodations procedures. In order to continue working on these tasks, the target date is modified from September 30, 2019, to September 30, 2020. Accomplishments: During FY 2019, the ICE Reasonable Accommodation internal tracking system was monitored and revised to gather pertinent information for the MD-715 – Part J. For example, name of the decision-maker, date(s) medical documentation was requested/received, tracking of purchases, purchase costs, and detailed information related to recurring requests have been captured throughout the year. Additionally, data not needed for completion of the MD-715 or internal ICE reports is no longer tracked on the internal tracking system. This revision reduced the amount of time spent gathering data for the MD-715 and resulted in a reduction in the average number of processing days. Case processing days were reduced on average by 23.55 days per case during FY 2019. The ICE Reasonable Accommodation procedures are in process of being revised, in accordance with the EEOC instruction. During FY 2019, additional benchmarking was completed with various law enforcement agencies and Disability Program Managers within other Federal Agencies. As a result, some of the best practices identified and being considered for adopting include: • increase in the number of RA processing days; • clearly identify the decision maker during the initiation of an RA request; • create RA decision letter templates for decision makers; and • the role of the RA Coordinator serves as a subject matter expert and facilitator of the interactive process. Staffing needs were reviewed in FY 2019, which resulted in the selection of an additional Reasonable Accommodation Coordinator who will onbo			

Brief Description of Program Deficiency		s, enforcement guidanc	res for processing requests for personal assistance services that comply with e, and other applicable executive orders, guidance, and standards? [see 29		
Objective	Establish PAS p	procedures that com	ply with EEOC's regulations and enforcement guidance.		
Target Date	Sep 30, 2019				
<b>Completion Date</b>					
	Target Date	Completion Date	Planned Activity		
	Jun 28, 2018		The Disability Program Manager will draft the PAS procedures.		
	Jun 28, 2018		Submit to the Chief Diversity Officer for review.		
	Sep 2, 2018		Submit to ODCR's embedded Attorney for review.		
<b>Planned Activities</b>	Oct 12, 2018		Post PAS FAQ's to ICE's public website. Additionally, PAS FAQ's are included in ICE-ODCR training for Managers and Supervisors.		
	Aug 31, 2019		Submit draft procedures to DHS Office for Civil Rights and Civil Liberties and relevant ICE program offices for review.		
	Sep 30, 2019		Submit final procedures to the EEOC for review and posting on the public website.		
Accomplishments	Fiscal Year	<u>Accomplishment</u>			
Objective	Establish PAS p	procedures that com	ply with EEOC's regulations and enforcement guidance.		
Target Date	Sep 30, 2020				
<b>Completion Date</b>					
	Target Date	Completion Date	Planned Activity		
	Sep 30, 2019		Submit the draft PAS procedures to Deputy Assistant Director for review.		
	Oct 15, 2019		Submit the PAS procedures to Assistant Director for review.		
Planned Activities	Feb 28, 2020		Submit draft procedures to DHS Office for Civil Rights and Civil Liberties (CRCL) and relevant ICE program offices for review.		
	Mar 20, 2020		Submit final procedures to the EEOC for review and posting on the public website		
	Fiscal Year	Accomplishment			
Accomplishments	2019	Modification to Target Date: The target date for submission to DHS CRCL and relevant ICE program offices for review is modified from August 31, 2019, to February 28, 2020. The target date for submitting the final procedures to the EEOC for review and posting to the ICE public website is modified from September 30, 2019, to March 30, 2020. Accomplishments: The Disability Program Manager completed the draft of the PAS procedures. The procedures have been reviewed by the Chief Diversity Officer and ODCR's attorneys, as well as the Deputy Assistant Director and Assistant Director of ODCR. All requested revisions have been completed and the procedures are currently in the process of being submitted for review to DHS CRCL.			

Brief Description of Program Deficiency	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.						
Objective	Establish PAS pro	Establish PAS procedures that comply with EEOC's regulations and enforcement guidance.					
Target Date	Sep 30, 2020	Sep 30, 2020					
<b>Completion Date</b>							
	Target Date	Completion Date	Planned Activity				
	Jun 28, 2018	June 28, 2020	The Disability Program Manager will draft the PAS procedures.				
	Oct 12, 2018	October 12, 2018	Post PAS FAQ's to ICE's public website. Additionally, PAS FAQ's are included in ICE ODCR training for Managers and Supervisors.				
	Sep 30, 2019	September 30, 2019	Submit draft to the Deputy Assistant Director for review.				
Planned Activities	Oct 15, 2019	October 15, 2019	Submit draft to Assistant Director for review.				
	Feb 28, 2020	February 28, 2020	Submit draft procedures to DHS Office for Civil Rights and Civil Liberties (CRCL) and relevant ICE program offices for review.				
	Mar 20, 2020		Submit final procedures to the EEOC for review and posting on the public website.				
	Jun 28, 2020	June 28, 2020	Submit draft to the Chief Diversity Officer for review.				
	Fiscal Year	<u>Accomplishment</u>					
Accomplishments	The Disability Program Manager completed the draft of the PAS procedures have been reviewed by the Chief Diversity Officer and ODCI attorneys, as well as the Deputy Assistant Director and Assistant Director ODCR. All requested revisions have been completed and the procedures currently in the process of being submitted for review to DHS CRCL.						

Brief Description of Program Deficiency	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1) (iii)(C)]							
Objective	improve the recru ODCR is launchi	Obtain information that aids ICE in creating strategies and tools to institute ways for agency to improve the recruitment, hiring, inclusion, retention and advancement of disabilities. Additionally, ODCR is launching an educational campaign to encourage ICE employees to validate and/or update their disability status in their MyEPP profiles.						
Target Date	Sep 30, 2020							
<b>Completion Date</b>								
	Target Date	Completion Date	Planned Activity					
	Oct 15, 2018		ODCR staff will draft information to be shared with all ICE employees which includes information regarding the re-survey, how the information is used, and the instructions for updating their information.					
	Oct 22, 2018		An ICE Broadcast message will be sent out to all employees, providing information regarding the resurvey, and the steps for updating their information.					
	Dec 15, 2018		ODCR will initiate a review of the exit interview survey instrument to capture data points for future assessment.					
Planned Activities	Sep 30, 2019		An ICE Broadcast message will be sent out to all employees, providing information regarding the resurvey, and the steps for updating their information. ONGOING					
	Jan 6, 2020		ODCR will contact the Office of Human Capital (OHC) to identify best method(s) for securing information from the exit interview survey.					
	Jan 13, 2020		Schedule quarterly meetings with OHC to receive updates on the primary causes for employee departures, by data points such as race, disability, age etc., to seek ways for improving retention and organizational effectiveness.					
	Feb 28, 2020		Schedule meeting with OHC to discuss timelines for future re-surveys of the ICE workforce.					
	Jun 30, 2020		Develop a plan for re-surveying the workforce, including schedule and method of implementation.					
	Fiscal Year	Accomplishment						
Accomplishments	2019	Modification to Target Date: The exit interview was not finalized nor implemented by OHC in FY 2019. The exit survey was launched on October 15, 2019, thus the target date to initiate a review of exit interview data has been modified from December 1, 2018 to December 15, 2019. Accomplishments: ODCR staff prepared and disseminated re-survey information via an ICE Broadcast message on October 22, 2018. The message included information regarding the re-survey, how the information would be used, and the instructions for updating personal information.						

Brief Description of Program E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]							
Objective	improve the recru ODCR is launching	Obtain information that aids ICE in creating strategies and tools to institute ways for agency to mprove the recruitment, hiring, inclusion, retention and advancement of disabilities. Additionally, ODCR is launching an educational campaign to encourage ICE employees to validate and/or update heir disability status in their MyEPP profiles.					
Target Date	Sep 30, 2020						
<b>Completion Date</b>							
	Target Date	Completion Date	Planned Activity				
	Oct 15, 2018	October 15, 2018	ODCR staff will draft information to be shared with all ICE employees, which includes information regarding the re-survey, how the information is used, and the instructions for updating their information.				
	Oct 22, 2018	October 22, 2018	An ICE broadcast message will be sent out to all employees, providing information regarding the resurvey, and the steps for updating their information.				
Planned Activities	Dec 15, 2019	December 15, 2019	ODCR will initiate a review of the exit interview survey instrument to capture data points for future assessment.				
	Jan 6, 2020	January 6, 2020	ODCR will contact the Office of Human Capital (OHC) to identify best method(s) for securing information from the exit interview survey.				
	Jan 13, 2020	January 13, 2020	Schedule quarterly meetings with OHC to receive updates on the primary causes for employee departures, by data points such as race, disability, age etc., to seek ways for improving retention and organizational effectiveness.				
	Feb 19, 2020		Schedule meeting with OHC to discuss timelines for future re-surveys of the ICE workforce.				
	Fiscal Year	Accomplishment					
	2019	ODCR staff prepa	ared and disseminated re-survey information via an ICE				
Accomplishments		Broadcast message on October 22, 2018. The message included information regarding the re-survey, how the information would be used, and the instructions for updating personal information.					

### Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD

#### A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

The Selective Placement Program Coordinator (SPCC) conducts training on the Federal Hiring Process and assisting applicants with completing a federal resume at local Employment Centers, Military Installations, and Rehabilitative Centers in the Washington, DC metro area. The SPPC also coordinates with hiring managers to consider hiring noncompetitive applicants before announcing the job on usajobs.gov.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

The Agency currently use the following authorities to hire persons with disabilities: 1. Schedule A for PWD and PWTD 2. Veterans with a 30% or greater disability rating Additionally, the agency uses the Wounded Warrior and the Human Exploitation Rescue

Operation (HERO) programs, which allow applicants to participate in an internship that may lead to a noncompetitive appointment.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

Applications are submitted via USAJobs. The applicant can upload their Schedule A letter, and/or their Disabled Veteran documentation, to be considered under one of the special hiring authorities. The Office of Human Capital (OHC) reviews the applicants resume to determine if they meet the minimum qualifications of the position for which they applied. If they are determined to meet the minimum qualifications of the position, they are referred to the hiring authority on a Schedule A/non-competitive cert, and/or Disabled Veteran 30% or more cert, for their consideration. Once the hiring official makes a selection, the selectee is notified and provided instructions for completing the pre-employment requirements as outlined in the tentative job offer. Once the applicant has completed and passed all pre-employment requirements they are provided an appointment letter.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer Yes

1. The use of the Schedule A hiring authority is covered as part of the mandatory annual training for managers and supervisors. It is also covered in "ICE Disabilities 201", an online training course. 2. The Schedule A and veterans hiring authorities are covered under the annual mandatory training for all hiring managers/supervisors and HR Specialists.

### B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

The SPPC provides the federal hiring process workshops at American Job Centers in the District of Columbia, Maryland, and Virginia regarding Schedule A hiring. The SPCC provides information on the Schedule A hiring process, how to create an effective federal resume, and one-on-one follow-up resume assistance. ODCR and OHC meet quarterly to share resources, including the use of Field Special Emphasis Program Managers (F-SEPM) at recruitment events and the development of targeted recruitment plans for increasing the representation of PWD's and PWTD's.

#### C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

a. New Hires for Permanent Workforce (PWD)

Answer No

b. New Hires for Permanent Workforce (PWTD)

Answer Yes

The ICE workforce consisted of 20, 021 permanent employees in FY 2019. Law Enforcement Officers (LEO) comprise 63% of the ICE workforce, and 37% of the ICE workforce hold non-Law Enforcement positions (non-LEO). Analysis of Table B-1 indicates that the percentage of New Hires in the permanent workforce for PWD is 12.42%, which exceeds the benchmark. Thus, ICE does not have a trigger related to the percentage of PWD New Hires in the permanent workforce. However, further analysis of Table B-1 indicates that the percentage of New Hires in the permanent workforce for PWTD is 1.08% which falls below the benchmark. Thus, ICE does have a trigger related to the percentage of PWTD New Hires in the permanent workforce. ICE conducted additional analysis of the available ICE workforce data for pay period 19. The analysis demonstrates that during FY 2019, ICE had a total of 1561 permanent new hires, of which 98 or 6.28% are coded as having a reportable disability.

		Reportable	Disability	Targeted Disability	
New Hires	Total	Permanent Workforce	Temporary Workforce	Permanent Workforce	Temporary Workforce
	(#)	(%)	(%)	(%)	(%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for MCO (PWD)

Answer Yes

b. New Hires for MCO (PWTD)

Answer Yes

The ICE workforce consisted of 20, 021 permanent employees in FY 2019. Law Enforcement Officers comprise 63% of the ICE workforce, and 37% of the ICE workforce hold non-Law Enforcement positions. Analysis of the available ICE Workforce Data for pay period 19, demonstrates that during FY 2019, ICE had a total of 1561 permanent new hires, of which 98 or 6.28% are coded as having a reportable disability. According to the ICE Workforce data, new hires among mission-critical occupations are noted as follows: General Inspection, Investigation, Enforcement and Compliance Series 1801 – 345 new hires of whom 24, or 6.96% have a reportable disability Criminal Investigator Series 1811 – 1,267 new hires of whom 0, or 0%, have a reportable disability Attorney/ General Attorney Series 0905 - 212 new hires of whom 6, or 2.83%, have a reportable disability In comparison to the benchmarks, the percentage of New Hires (external selections) among the qualified external applicants for General Inspection, Investigation, Enforcement and Compliance job series (1801) as mission critical positions are PWD (21.13) and PWTD (3.09%). The physical requirements of the Criminal Investigator series (1801), are a potential barrier for PWD and PWTD applicants; however, as noted in FY 2019, ICE does not have a trigger for New Hires to General Inspection, Investigation, Enforcement and Compliance job series (1801). ICE conducted additional analysis regarding the Criminal Investigator series and determined that all positions within series 1801 are not Law Enforcement positions. The non-Law Enforcement positions within the 1801 series, appears to provide a platform for the entrance of PWD and PWTD individuals into the 1801 series. In comparison to the benchmarks, the percentage of New Hires (external selections) among the qualified external applicants for Criminal Investigator series (1811) as mission critical positions are PWD (6.70%) and PWTD (0%). The physical requirements of the Criminal Investigator series (1811), are a potential barrier for PWD and PWTD applicants, however, as noted in FY 2019, ICE does not have a trigger for New Hires to Criminal Investigator series (1811). ICE conducted additional analysis regarding the Criminal Investigator series and determined that all positions within series 1811 are not Law Enforcement positions. The non-Law Enforcement positions within the 1811 series, appears to provide a platform for the entrance of PWD and PWTD individuals into the 1811 series. In comparison to the benchmarks, the percentage of New Hires (external selections) among the qualified external applicants for Attorney/General Attorney series (0905) as mission critical positions are PWD (5.77%) and PWTD (0%). Therefore, ICE has a trigger regarding PWD and PWTD individuals within the 0905 series. In comparison to the benchmarks, the percentage of New Hires (external selections) among the qualified external applicants for Intelligence Research Specialist job series (0132) as mission critical positions are PWD (9.52%) and PWTD (1.59%). Therefore, ICE Has a trigger regarding PWD and PWTD individuals within the 0132 series.

New Hires to		Reportable Disability Targetable D			Disability
Mission-Critical Occupations	Total	Qualified Applicants	New Hires	Qualified Applicants	New Hires
	(#)	(%)	(%)	(%)	(%)
Numerical Goal		12%		2%	

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Qualified Applicants for MCO (PWD)

Answer No

b. Qualified Applicants for MCO (PWTD)

Answer Yes

Analysis of the available ICE Workforce Data for pay period 19 indicates that there were 1,561 new hires during FY 2019, of which 2% joined ICE as a DHS Intra-Agency transfer. The available information includes all applicants, not just internal applicants for open positions. Additionally, identifying which current ICE employees would qualify for a job series that they are not currently assigned to is a difficult undertaking. OHC does not adjudicate applicant qualifications until an applicant applies for a specific position, and the applicant may qualify based on experience obtained prior to entry into their current job series, or into ICE. Analysis of Table B 6-1 Per indicates that a trigger exists in regard to Qualified Applicants for General Inspection, Investigation, Enforcement and Compliance job series (1801) among PWTD. Analysis of Table B 6-1 Per (2) indicates that a trigger exists in regard to Qualified Applicants for Criminal Investigator job series 1811 among PWD and PWTD. Analysis of Table B 6-1 Per (4) indicates that a trigger exists in regard to Qualified Applicants for Intelligence Research Specialist job series 0132 among PWTD.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission- critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Promotions for MCO (PWD)

Answer Yes

b. Promotions for MCO (PWTD)

Answer Yes

Analysis of the available ICE Workforce Data for pay period 19 demonstrates that, during FY 2019, ICE had a total of 3,588 promotions within the workforce. Promotions in relation to mission-critical occupations are noted as follows: Series 1801 - 1,079promotions Series 1811 – 1,267 promotions Series 0905 – 181 promotions Additionally, the available ICE Workforce Data for pay period 19 does not contain PWD or PWTD classification for ICE employees whom received a promotion. The available USA Staffing Applicant Flow Data only provides information regarding Internal Competitive promotions for mission critical positions across all grades. Additionally, the Applicant Flow Data provided by USA Staffing is only made available when the announcement is closed and all certificates for a vacancy have been audited. According to Table B 6-1 Per, that 24.17% of the internal selections for promotion involving the General Inspection, Investigation, Enforcement and Compliance job series (1801) are PWDs. Additionally, ICE noted that 1.66% of the internal selections for promotion involving the General Inspection, Investigation, Enforcement, and Compliance job series (1801) are PWTDs. Based on the available information it appears that a trigger exists for PWTD among internal selections for promotion. According to Table B6-1 Per (2) regarding PWD for internal selections Criminal Investigator job series. Due to this error, it is not currently possible to determine whether a trigger exists related to PWD among Series 1811. Additionally, ICE noted that 71% of internal selections for promotion involving the Criminal Investigator job series (1811) are PWTDs. Based on the available information it appears that a trigger exists for PWD among internal selections for promotion. According to Table B 6-1 Per (3) that 4.35% of internal selections for promotion involving the Attorney/General Attorney series (0905) are PWDs. Additionally, ICE noted that none of the internal selections for promotion involving the Attorney/ General Attorney series (0905) are PWTDs. Based on the available information it appears that a trigger exists for PWD and PWTD among internal selections for promotion. According to Table B 6-1 Per (4) that 34.04% of internal selections for promotion involving the Intelligence Research Specialist job series (0132) are PWDs. Additionally, ICE noted that 1.42% of internal selections for promotion involving the Intelligence Research Specialist job series (0132) are PWTDs. Based on the available information it appears that a trigger exists for PWTD among internal selections for promotion. The available Applicant Flow Data contains all applicants for promotions, thus ICE is unable to truly identify the percentage of qualified internal PWTD applicants whom have been promoted to Attorney/General Attorney series (0905) positions. In conducting a comparison of the available information, the benchmarks, it appears that a trigger exists for PWD (0.00%) and PWTD (0.00%) among the selections for promotion involving the Attorney/General Attorney series (0905) during FY 2018. The available Applicant Flow Data contains all applicants for promotions, thus ICE is unable to truly identify the percentage of qualified internal PWTD applicants whom have been promoted to Intelligence Research Specialist job series (0132) positions. In conducting a comparison of the available information, the benchmarks, it appears that a trigger exists for PWD (2.13%) and PWTD (2.13%) among the selections for promotion involving the Intelligence Research Specialist job series (0132) during FY 2018.

# Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

#### A. ADVANCEMENT PROGRAM PLAN

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

In FY 2019, ODCR provided training for Managers and Supervisor's with the goal of increasing their knowledge in the areas of Diversity, Reasonable Accommodation, and Anti-Harassment. ODCR's goal for providing this training is to equip Managers and Supervisor's with the tools and resources available for recruiting and effectively managing PWD and PWTD employees. These tools and resources equip ICE Managers and Supervisor's to identify the unique qualities of PWD and PWTD employees. In FY 2019, the Disability Program Manager worked with the ICE Office of Leadership and Career Development (OLCD) to ensure data will be collected regarding PWD and PWTD participation, and that all notifications/announcements contain information for requesting a reasonable accommodation. Additionally, the Disability Program Manager attended the DHS Academia and Professional Development Symposium and identified the points of contact for the Homeland Security Rotation Program, Joint Duty Program, DHS SES Candidate Development Program, and the DHS Joint Mission Fellows Program. During FY 2020 the Disability Program Manager will be coordinating with the newly identified points of contact to ensure data will be collected regarding PWD and PWTD participation.

#### **B. CAREER DEVELOPMENT OPPORTUNITES**

1. Please describe the career development opportunities that the agency provides to its employees.

ICE offers training opportunities for employees via the DHS Performance and Learning Management System (PALMS) online portal. In addition to completing required training, this portal allows ICE employees to complete certification(s) and career development courses, which may lead to career advancement. The ICE OLCD consists of the Leadership Development Center and the Training and Performance Support Division. OLCD provides training for the ICE workforce that serve to enhance current skills, and build new skills, which may enhance opportunities for career advancement. The Leadership Development Center (LDC) provides resident, virtual, and exported leadership and career development training to enhance the knowledge, skills, and abilities of all employees. The LDC supports professional development of all leader-levels of the Department of Homeland Security Leader Development Program framework to include a variety of services. Courses available via the LDC provides opportunities for employees to increase knowledge, skills and abilities leading to opportunities for career advancement. Additionally, ICE employees can participate in training opportunities provided by Department of Homeland Security (DHS). DHS offers academic programs, leader development, career development, mandatory training, professional development, and technical skills training.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

Career Development	Total Participants		PWD		PWTD	
Career Development Opportunities	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Coaching Programs						
Other Career Development Programs	1234	1234	29.9	29.9	12.44	
Internship Programs						
Fellowship Programs						
Detail Programs						
Mentoring Programs	250	250	2.39	2.39	0.4	0.4
Training Programs						

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes",

describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWD)

Answer Yes

b. Selections (PWD)

Answer Yes

Analysis of data gathered in FY 2019 indicates that ICE has triggers for PWD among applicants and selectees for Career Development Programs.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWTD)

Answer Yes

b. Selections (PWTD)

Answer Yes

Analysis of data gathered in FY 2019 indicates that ICE has triggers for PWTD among applicants and selectees for Career Development Programs.

#### C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If "yes", please describe the trigger(s) in the text box.

a. Awards, Bonuses, & Incentives (PWD)

Answer Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

Analysis of the ICE Workforce Data pay period 19, indicates that in FY 2019, ICE employees received 38,058 awards. However, the ICE Workforce Data for pay period 19, does not contain codification of PWD or PWTD for employees whom received an award. Therefore, ICE used information provided on Table B 9 to conduct the required analysis. The agency identified triggers involving the percentage of PWD and PWTD who received Time Off Awards hours, as follows: PWD whom received a Time Off Award of 11-20 hours. PWTD whom received a Time Off Award of 21-30 hours. PWTD whom received a Time Off Award of 21-30 hours. PWTD whom received a Time Off Award of 31-40 hours. PWTD whom received a Time Off Award of 31-40 hours. PWTD whom received a Time Off Award of 31-40 hours. PWTD whom received a Time Off Award of 31-40 hours. PWTD whom received Cash Awards, as follows: PWD whom received a Cash Award \$1,000-\$1,999 PWTD whom received a Cash Award \$1,000-\$1,999 PWTD whom received a Cash Award \$1,000-\$2,999 PWTD whom received a Cash Award \$2,000-\$2,999 PWD whom received a Cash Award \$4,000-\$4,999 PWTD whom received a Cash Award \$5,000-\$5,999 PWTD whom received a Cash Award \$6,000-\$6,000-\$6,000-\$6,000-\$6,000-\$6,000-\$6,000-\$6,000-\$6,000-\$6,000-\$6,000-\$6,000-\$6,000-\$6,

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance- based pay increases? If "yes", please describe the trigger(s) in the text box.

a. Pay Increases (PWD)

Answer No

b. Pay Increases (PWTD)

Answer Yes

Analysis of Table B-9 indicates that ICE has a trigger regarding Quality Step Increases for PWTDs.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.

a. Other Types of Recognition (PWD)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

#### **D. PROMOTIONS**

- 1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
  - a. SES

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

The available USA Staffing Applicant Flow Data only provides information regarding Internal Competitive promotions for mission critical positions across all grades. Additionally, the Applicant Flow Data provided by USA Staffing is only made available when the announcement is closed and all certificates for a vacancy have been audited. Thus, ICE is unable to identify the percentage of qualified internal PWTD applicants whom have been promoted to SES, GS-15, GS-14, or GS-13 positions. Analysis of the available ICE Workforce Data for pay period 19 demonstrates that, during FY 2019, there were a total of 3,588 promotions within the workforce. Promotions in relation to SES, GS-15, GS-14, or GS-13 positions are noted as follows: SES – the available data does not contain information regarding promotions to SES positions. GS-15 – According to the current workforce data indicates that 187 individuals were promoted to GS-15 positions. However, current workforce data does not contain information regarding disability

coding for these individuals, thus we are unable to determine how many PWDs were promoted to a GS-15 position. GS-14 – According to the current workforce data indicates that 627 individuals were promoted to GS-14 positions. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWDs were promoted to a GS-14 position. GS-13 – According to the current workforce data indicates that 554 individuals were promoted to GS-13 positions. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWDs were promoted to a GS-13 position. Additionally, analysis of Table B 7-1, which identified triggers among SES, GS-15, GS-14, and GS-13 grades for PWD.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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a.		

a. DED		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes

The available USA Staffing Applicant Flow Data only provides information regarding Internal Competitive promotions for mission critical positions across all grades. Additionally, the Applicant Flow Data provided by USA Staffing is only made available when the announcement is closed and all certificates for a vacancy have been audited. Thus, ICE is unable to identify the percentage of qualified internal PWTD applicants whom have been promoted to SES, GS-15, GS-14, or GS-13 positions. Analysis of the available ICE Workforce Data for pay period 19 demonstrates that, during FY 2019, there were a total of 3,588 promotions within the workforce. Promotions in relation to SES, GS-15, GS-14, or GS-13 positions are noted as follows: SES – the available data does not contain information regarding promotions to SES positions. GS-15 – According to the current workforce data indicates that 187 individuals were promoted to GS-15 positions. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWTDs were promoted to a GS-15 position. GS-14 – According to the current workforce data indicates that 627 individuals were promoted to GS-14 positions. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWTDs were promoted to GS-13 positions. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWTDs were promoted to a GS-13 position. Additionally, analysis of Table B 7-1, which identified triggers among SES, GS-15, GS-14, and GS-13 grades for PWTD.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD)

Answer Yes

b. New Hires to GS-15 (PWD)

Answer No

c. New Hires to GS-14 (PWD)

Answer Yes

d. New Hires to GS-13 (PWD)

Answer Yes

Analysis of Table B 7-1, identified triggers in regard to New Hires among GS-14, and GS-13 grades for PWD. ICE was unable to determine if a trigger exists for PWD new hires to SES, as Table B 7-1 does not contain information regarding new hires for SES. However, analysis of the available ICE Workforce Data for pay period 19, demonstrates that, during FY 2019, ICE had a total of 1,561 new hires. Additionally, ICE workforce data indicates that 42.25% of new hires were Law Enforcement Officers, and 57.75% of new hires were non-Law Enforcement Officers. FY 2019 new hires in relation to SES, GS-15, GS-14, or GS-13 positions are noted as follows: SES – the available data does not contain information regarding new hires to SES positions. GS-15 – According to the available data there were 17 new hires to GS-15 positions. Additional analysis demonstrates that of the 17 individuals, 0% were Law Enforcement Officers, and 100% were non-Law Enforcement Officers. Additionally, of the 17 selectees, 11.76% were individuals with a reportable disability. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWDs were new hires to a GS-15 position. GS-14 - According to the available data there were 148 new hires to GS-14 positions. Additional analysis demonstrates that of the 148 individuals, 2% were Law Enforcement Officers, and 98% were non-Law Enforcement Officers. Additionally, of the 149 selectees, 8% were individuals with a reportable disability. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWDs were new hires to a GS-14 position. GS-13 – According to the available data, there were 176 new hires to GS-13 positions. Additional analysis demonstrates that of the 176 individuals 6.86% were Law Enforcement Officers, and 93.14% were non-Law Enforcement Officers. Additionally, of the 175 selectees, 7.43% were individuals with a reportable disability. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWDs were new hires to a GS-13 position. Historically, ICE had a trigger regarding PWD among new hires in the senior grade levels, regarding SES, GS-15 and GS-14. Based on the available workforce data ICE anticipates that a trigger remains regarding PWD in the SES, GS-15 and GS-14 positions. It is also important to note that the physical requirements of the Law Enforcement positions at ICE, are a barrier for PWD and PWTD applicants, that cannot be resolved, therefore ICE may experience barriers in reaching the PWD benchmark as it relates to Law Enforcement officers among selectees for promotion.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWTD)

Answer Yes

b. New Hires to GS-15 (PWTD)

Answer Yes

c. New Hires to GS-14 (PWTD)

Answer Yes

d. New Hires to GS-13 (PWTD)

Answer Yes

Analysis of Table B 7-1, identified triggers in regard to New Hires among GS-15, GS-14, and GS-13 grades for PWTD. ICE was unable to determine if a trigger exists for PWTD new hires to SES, as Table B 7-1 does not contain information regarding new hires for SES. However, analysis of the available ICE Workforce Data for pay period 19, demonstrates that during FY 2019, ICE had a total of 1,561 new hires. Additionally, ICE workforce data indicates that 42.25% of new hires were Law Enforcement Officers, and 57.75% of new hires were non-Law Enforcement Officers. FY 2019 new hires in relation to SES, GS-15, GS-14, or GS-13 positions are noted as follows: SES – the available data does not contain information regarding new hires to SES positions. GS-15 – According to the available data there were 17 new hires to GS-15 positions. Additional analysis demonstrates that of the 17 individuals 0% were Law Enforcement Officers, and 100% were non-Law Enforcement Officers. Additionally, of the 17 selectees, 11.76% were individuals with a reportable disability. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWTDs were new hires to a GS-15 position. GS-14 – According to the available data there were 148 new hires to GS-14 positions. Additional analysis demonstrates that of the 148 individuals 2% were Law Enforcement Officers, and 98% were non-Law Enforcement Officers. Additionally, of the 149

selectees, 8% were individuals with a reportable disability. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWTDs were new hires to a GS-14 position. GS-13 – According to the available data, there were 176 new hires to GS-13 positions. Additional analysis demonstrates that of the 176 individuals 6.86% were Law Enforcement Officers, and 93.14% were non-Law Enforcement Officers. Additionally, of the 175 selectees, 7.43% were individuals with a reportable disability. However, current workforce data does not contain information regarding disability coding for these individuals, thus we are unable to determine how many PWTDs were new hires to a GS-13 position. Historically, ICE had a trigger regarding PWTD among new hires in the senior grade levels, regarding SES, GS-15 and GS-14. Based on the available workforce data ICE anticipates that a trigger remains regarding PWTD in the SES, GS-15 and GS-14 positions. It is also important to note that the physical requirements of the Law Enforcement positions at ICE, are a barrier for PWD and PWTD applicants, that cannot be resolved, therefore ICE may experience barriers in reaching the PWTD benchmark as it relates to Law Enforcement officers among selectees for promotion.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified

applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

b. Managers

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

Analysis of the available ICE Workforce Data for pay period 19, demonstrates that during FY 2019, there were a total of 3,588 promotions within the workforce. The available Applicant Flow Data provided by USA Staffing only provides information regarding Internal Competitive promotions for mission critical positions across all grades. Additionally, the Applicant Flow Data provided by USA Staffing is only made available when the announcement is closed and all certificates for a vacancy have been audited. Thus, based on available Applicant Flow Data, ICE is unable to determine if a trigger exists involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions. Due to the inability to identify only Qualified Internal Applicants, we anticipate that ICE continues to have triggers regarding PWTD Qualified Internal Applicants within Executives, Managers and Supervisors at all levels.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

i. Qualified Internal Applicants (PWTD)

Answer Yes

ii. Internal Selections (PWTD)

Answer Yes

b. Managers

FY 2019

i. Qualified Internal Applicants (PWTD)ii. Internal Selections (PWTD)Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWTD)ii. Internal Selections (PWTD)Answer Yes

Analysis of the available ICE Workforce Data for pay period 19, demonstrates that during FY 2019, there were a total of 3,588 promotions within the workforce. The available Applicant Flow Data provided by USA Staffing only provides information regarding Internal Competitive promotions for mission critical positions across all grades. Additionally, the Applicant Flow Data provided by USA Staffing is only made available when the announcement is closed and all certificates for a vacancy have been audited. Thus, based on available Applicant Flow Data, ICE is unable to determine if a trigger exists involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions. Due to the inability to identify only Qualified Internal Applicants, we anticipate that ICE continues to have triggers regarding PWTD Qualified Internal Applicants within Executives, Managers and Supervisors at all levels.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWD)

Answer Yes

b. New Hires for Managers (PWD)

Answer Yes

c. New Hires for Supervisors (PWD)

Answer Yes

Analysis of the available ICE Workforce Data for pay period 19, demonstrates that there was a total of 1,561 new hires during FY 2019. At this time the available Applicant Flow Data is provided by USA Staffing and only provides information regarding Internal Competitive promotions for mission critical positions across all grades. Additionally, the Applicant Flow Data provided by USA Staffing is only made available when the announcement is closed and all certificates for a vacancy have been audited. Thus, based on available Applicant Flow Data ICE is unable to determine if a trigger exists involving PWD for new hires to supervisory positions. Analysis of Table B 8-1, identified triggers in regard to New Hires among Executives, Managers and Supervisors for PWD.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWTD)

Answer Yes

b. New Hires for Managers (PWTD)

Answer Yes

c. New Hires for Supervisors (PWTD)

Answer Yes

Analysis of the available ICE Workforce Data for pay period 19, demonstrates that there were a total of 1,561 new hires during FY 2019. At this time the available Applicant Flow Data is provided by USA Staffing and only provides information regarding Internal Competitive promotions for mission critical positions across all grades. Additionally, the Applicant Flow Data provided by USA Staffing is only made available when the announcement is closed and all certificates for a vacancy have been audited. Thus, based on available Applicant Flow Data ICE is unable to determine if a trigger exists involving PWD for new hires to supervisory positions. Analysis of Table B 8-1, identified triggers in regard to New Hires among Executives, Managers and Supervisors for PWTD.

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

#### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

Answer No

All Schedule A employees, who were eligible for conversion to competitive service in FY 2019 were not converted. ODCR has received updated data regarding the ICE Schedule A employees eligible for conversion and will be working with the OHC to ensure those who have satisfactorily completed their 2 years are converted to competitive service, as appropriate.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWD)

Answer Yes

b.Involuntary Separations (PWD)

Answer Yes

Using the inclusion rate as the benchmark, indicates that ICE has a trigger among PWD whom voluntary or involuntary separated from the agency during FY 2019. Further analysis was conducted using ICE Workforce Data for pay period 19, which indicates there were 1,283 voluntary separations, and 70 involuntary separations, for a total of 1,353 separations during FY 2019. The employees voluntarily separated from the agency were comprised of 547 Law Enforcement Officers, and 736 were non-Law Enforcement Officers. The employees whom were involuntarily separated from the agency were comprised of 34 Law Enforcement Officers, and 36 were non-Law Enforcement Officers. The available Workforce Data for pay period 19 indicates that 131 of the individuals, who voluntarily separated during FY 2019, had a reportable disability. Additionally, the Workforce Data for pay period 19 indicates that 10 of the individuals who involuntarily separated during FY 2019, had a reportable disability.

Seperations Tota	Without Repo Reportable Disabilities % Disabilities
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3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWTD)

Answer Yes

b.Involuntary Separations (PWTD)

Answer Yes

Using the inclusion rate as the benchmark indicates that ICE has a trigger among PWTD whom voluntary or involuntary separated from the agency during FY 2019. Further analysis was conducted utilizing ICE Workforce Data for pay period 19, which indicates there were 1,283 voluntary separations, and 70 involuntary separations, for a total of 1,353 separations during FY 2019. The employees voluntarily separated from the agency were comprised of 547 Law Enforcement Officers and 736 were non-Law Enforcement Officers. The employees whom were involuntarily separated from the agency were comprised of 34 Law Enforcement Officers and 36 were non-Law Enforcement Officers. The available Workforce Data for pay period 19 indicates, that 131 of the individuals who voluntarily separated during FY 2019 had a reportable disability. Additionally, the Workforce Data for pay period 19 indicates that 10 of the individuals who voluntarily separated during FY 2019 had a reportable disability.

			Without Targeted Disabilities
Seperations	Total #	Targeted Disabilities %	%

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

Not applicable

#### B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

A notice of employees' and applicants' rights under Section 508 appears at: https://www.ice.gov/doclib/about/offices/dcr/pdf/noticeOfRightsABA.pdf.

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the

Architectural Barriers Act, including a description of how to file a complaint.

A notice of employees' and applicants' rights under the Architectural Barriers Act appears at: https://www.ice.gov/doclib/about/offices/dcr/pdf/noticeOfRightsABA.pdf

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

ODCR staff is currently working with supervisors in various locations throughout ICE to address identified architectural barriers. Additionally, ODCR staff is drafting a plan to assess ICE facilities to identify potential Architectural Barriers. ODCR staff conducted Architectural Barrier walkthroughs of six ICE offices in Washington, DC during FY 2019. ODCR staff will complete the last Architectural Barrier walkthrough in the Washington, DC area during the first quarter of FY 2020, as well as completing walkthroughs in the Baltimore, MD area. F-SEPM's will be provided training in FY 2020 to conduct walkthroughs of ICE facilities. The F-SEPM's will be used to complete walkthroughs of ICE facilities, during which they will complete a checklist and return a written report to the Disability Program Manager. We will implement strategies to resolve the identified Architectural Barriers from the Washington, DC inspections in FY 2020. ODCR staff continues to work with the Office of the Chief Information Officer and the 508 Compliance Office to resolve issues related to the use of JAWS on the ICE network, and to improve accessibility for visually impaired employees to the ICE network.

#### C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The average processing time for reasonable accommodation requests in FY 2019 was 66.95 days. In comparison with the average processing time in FY 2018, the RA team reduced the average processing days in FY 2019 by 23.55 days.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

In FY 2019, the reasonable accommodation tracking system was updated to include tracking reassignment searches, requests for

reconsideration, and to facilitate the identification of barriers within the processing of requests. The gathering of this additional information has provided us the opportunity to continue streamlining our processes, with the goal of reducing the number of processing days. Standardized emails were revised to aid reasonable accommodation coordinators when requesting needed information from employees and decision-makers. The development of these standardized emails has led to an increase in responses from employees and decision-makers. Additionally, we have noted that decision-makers are providing more in-depth responses regarding decisions as well as an increase in decision-makers providing alternative accommodations if the requested accommodation would not be effective. Additionally, during FY 2019, the reasonable accommodation templates were revised, and a plan established to transition the preparation of reasonable accommodation response letters to the Decision-makers.

## D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

During FY 2019, the draft PAS procedures and templates underwent internal clearance, which included comment reviews and revisions as indicated. The Statement of Work was finalized, as well as the market research report. In the interim, ICE provided PAS FAQ's to Managers and Supervisors during FY 2018 mandatory EEO training and published them on ICE's intranet site available to all employees. During FY 2019, ICE did not receive any PAS requests.

### Section VII: EEO Complaint and Findings Data

#### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer No

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer No

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer Yes

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

Complaint was resolved via settlement agreement, there was no finding of discrimination.

### Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer Yes

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	The lower than expected participation of PWD in the permanent workforce, regarding grade GS-11 to SES, as compared to the goal of 12%.
STATEMENT OF BARRIER	Barrier Group
GROUPS:	People with Disabilities
BARRIER ANALYSIS:	
Provide a description of the steps taken and data analyzed to determine cause of the condition.	
STATEMENT OF IDENTIFIED BARRIER:	Architectural Barriers have been identified at ICE facilities in Washington, DC. Physical requirement barriers have been identified regarding Law Enforcement positions.
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	
Objective	To resolve architectural barriers for GS-11 to SES in the permanent workforce regarding PWD.
	Date Objective Oct 1, 2019 Initiated
	Target Date For Completion Of Objective
Responsible Officials	Lynn Dickson Disability Program Manager
	Rita Bhanot Acting Deputy Chief
	Scott Lanum Assistant Director for Diversity and Civil Rights
	Stacie Jones Chief Diversity Officer Robin Kilgore Deputy Assistant Director
	Noom Kilgote Deputy Assistant Director

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Conduct barrier analysis to identify any potential barriers.	No	06/30/2020	
01/31/2020	Draft a plan of action to resolve identified barriers.	No	09/30/2020	
06/30/2021	Implement plans of action to resolve identified barriers.	No		
06/30/2020	Develop a state by state list of universities and colleges whom provide career development services for individuals with disabilities.	No		09/26/2019
12/30/2019	Conduct a pilot walkthrough of ICE facilities in Baltimore to identify Architectural Barriers.	Yes	12/31/2020	
09/30/2020	Establish a national strategy to conduct Architectural Barrier investigations of ICE facilities.	No		
09/30/2020	Develop a state by state list of local disability agencies whom serve potential job candidates.	No		
09/30/2020	Draft a plan to address identified Architectural Barriers for ICE Facilities in Washington, DC.	Yes		
12/31/2020	Implement resolutions for identified Architectural Barriers for ICE Facilities in Washington, DC.	Yes		
12/31/2021	Implement resolutions for identified Architectural Barriers for ICE Facilities in Baltimore.	Yes		
01/31/2021	Provide training for F-SEPM's for conducting independent inspections to identify Architectural Barriers.	Yes		
06/30/2020	Develop reasonable accommodation materials to be provided to perspective job applicants.	No		
09/30/2020	Develop reasonable accommodation materials to be provided to perspective job applicants at community events.	No		
09/30/2020	Develop marketing materials to provide to colleges whom provide career development services for individuals with disabilities.	No		
09/30/2019	Conduct a pilot walkthrough of ICE facilities in Washington, DC to identify Architectural Barriers.	Yes	12/31/2020	
09/30/2019	Coordinate with SPPC and Recruiting to provide information regarding reasonable accommodation to perspective job applicants at community events.	No	09/30/2020	
09/30/2021	Draft a plan to address identified Architectural Barriers for ICE Facilities in Baltimore.	Yes		
09/30/2020	Draft a plan to expand investigations related to Architectural Barriers to other geographic locations.	No		
08/30/2020	Develop training for F-SEPM's regarding the identification of Architectural Barriers	Yes		
Fiscal Year	Accomplish	ments		
2019	OCDR coordinated with the General Services Administration (GSA) regarding the Architectural Barriers requirements and checklists for a Additionally, we coordinated with POCs in five (5) locations and cor of ICE facilities in Washington, DC.	and the Architectur conducting Architec	tural Barriers walk thi	oughs.
2019	Barrier analysis was implemented in FY 2019, with a focus on identi employees throughout the ICE workforce. Review of position descrip physical requirements, inability to control meal times, and necessity Enforcement Officers and non-Law Enforcement Officers.	otions for the 1801 s	eries noted potential b	parriers in regard

STATEMENT OF CONDITION THAT FRIGGER FOR A POTENTIAL BARE	Γ WAS A	The low number of selections of PWTD regarding new hires in the permanent workforce as compared to the goal of 12%.			
Provide a brief narratidescribing the conditi					
How was the condition recognized as a poten					
STATEMENT OF B	ARRIER	Barrier Group			
GROUPS:		People with Targeted Disabilities			
BARRIER ANALY	SIS:				
Provide a description taken and data analyz determine cause of the	ed to				
STATEMENT OF IDENTIFIED BARI	RIER:	Architectural Barriers have been identified at ICE faci	lities in Washington,	, DC.	
Provide a succinct stath agency policy, proor practice that has be determined to be the undesired condition.	ocedure een				
Objective		To increase the number of PWTD selections (new hin  Date Objective Initiated  Target Date For Completion Of Objective	res) in the permanent	workforce.	
Respons	sible Officials	Rita Bhanot Acting Deputy Chief Lynn Dickson Disability Program Manager Robin Kilgore Deputy Assistant Director Stacie Jones Chief Diversity Officer Scott Lanum Assistant Director for Diversity and Civ	vil Rights		
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
03/30/2021	Implement pl	ans of action to resolve identified barriers.	No		
06/30/2021	Draft an outre	each plan in partnership with OHC to target these	No		
09/30/2020	Conduct addi	tional analysis to identify additional barriers.	No		
09/30/2020	ODCR and O	HC will share resources, including the utilization of Emphasis Program Managers at recruitment events.	No		
01/31/2021	ODCR and O recruitment e	HC will share resources and participate in vents for Gallaudet University and the National titute for the Deaf (NTID) at the Rochester Institute	No		
09/20/2021		xeting materials to be provided to the Disability at of Contact at these institutions.	No		
11/30/2020	Draft a plan o	f action to resolve identified barriers.	No		
03/30/2021		te by state list of Law Schools and their Disability	No		

STATEMENT OF CONDITION THA TRIGGER FOR A POTENTIAL BAR		ICE has a perceived trigger involving PWD and mission critical occupations.	ICE has a perceived trigger involving PWD and PWTD among qualified internal applicants for mission critical occupations.		
Provide a brief narra describing the condi-					
How was the conditi recognized as a pote					
STATEMENT OF	BARRIER	Barrier Group			
GROUPS:		People with Disabilities			
		People with Targeted Disabilities			
BARRIER ANALY	YSIS:				
Provide a descriptio taken and data analy determine cause of t	zed to				
STATEMENT OF IDENTIFIED BAR	RRIER:	Data is not available for Qualified Internal Applicants.			
Provide a succinct s the agency policy, p or practice that has l determined to be the undesired condition	rocedure been e barrier of the				
Objective		Obtain applicant flow data for qualified internal applicate Objective Oct 1, 2019  Initiated	cants.		
		Target Date For Dec 31, 2021 Completion Of Objective			
Respor	nsible Officials	Rita Bhanot Acting Deputy Chief Stacie Jones Chief Diversity Officer Scott Lanum Assistant Director for Diversity and Civ Lynn Dickson Disability Program Manager Robin Kilgore Deputy Assistant Director	il Rights		
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Monitor upda Applicant Da	ites regarding the availability of updated Internal ta.	No		09/30/2019
09/30/2020	a custom repo	or the USA Staffing point of contact to determine if or can be developed for ICE that would provide the petitive promotions information broken down by	Yes		
09/30/2020	Conduct barrier analysis to determine if triggers exist, once data is available.				
Fiscal Year		Accomplish	ments		
2019	Applicant Flo	ow Data was obtained via the USA Staffing portal which		on regarding internal	competitive
2019	Barrier analysemployees the physical requirement	sis was implemented in FY 2019, with a focus on identi roughout the ICE workforce. Review of position descrip irements, inability to control meal times, and necessity Officers and non-Law Enforcement Officers.	otions for the 1801 s	eries noted potential b	parriers in regard to

The lower than expected participation of PWTD in the permanent workforce, regarding grade GS-11 to SES.
Barrier Group
People with Targeted Disabilities
Architectural Barriers have been identified at ICE facilities in Washington, DC. Physical requirement barriers have been identified in regard to Law Enforcement positions.
To resolve architectural barriers for GS-11 to SES in the permanent workforce regarding PWTD.  Date Objective Initiated Oct 1, 2019
Target Date For Dec 31, 2021 Completion Of Objective
Lynn Dickson Disability Program Manager
Robin Kilgore Deputy Assistant Director
Rita Bhanot Acting Deputy Chief
Stacie Jones Chief Diversity Officer Scott Lanum Assistant Director for Diversity and Civil Rights

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Conduct a pilot walkthrough of ICE facilities in Washington, DC to identify Architectural Barriers.	No	12/31/2020	
09/30/2020	Develop a state by state list of local disability agencies whom serve potential job candidates.	No		
06/30/2020	Develop a state by state list of universities and colleges whom provide career development services for individuals with disabilities.	No		09/26/2019
09/30/2019	Conduct barrier analysis to identify any potential barriers.	No	06/30/2020	
12/30/2019	Conduct a pilot walkthrough of ICE facilities in Baltimore to identify Architectural Barriers	Yes	12/31/2020	
01/31/2020	Draft a plan of action to resolve identified barriers.	No	09/30/2020	
06/30/2021	Implement plans of action to resolve identified barriers.	No		
09/30/2019	Coordinate with SPPC and Recruiting to provide information regarding reasonable accommodation to perspective job applicants at community events.	No	09/30/2020	
06/30/2020	Develop reasonable accommodation materials to be provided to perspective job applicants.	No		
09/30/2020	Develop reasonable accommodation materials to be provided to perspective job applicants at community events.	No		
09/30/2020	Develop training for F-SEPM's regarding the identification of Architectural Barriers.	No		
09/30/2020	Develop marketing materials to provide to colleges whom provide career development services for individuals with disabilities.	No		
09/30/2020	Draft a plan to address identified Architectural Barriers for ICE Facilities in Washington, DC.	No		
09/30/2020	Draft a plan to expand investigations related to Architectural Barriers to other geographic locations.	No		
12/31/2020	Implement resolutions for identified Architectural Barriers for ICE Facilities in Washington, DC.	No		
09/30/2020	Establish a national strategy to conduct Architectural Barrier investigations of ICE facilities.	No		
01/31/2021	Provide training for F-SEPM's for conducting independent inspections to identify Architectural Barriers	No		
Fiscal Year	Accomplish	ments		
2019	Barrier analysis was implemented in FY 2019, with a focus on identi employees throughout the ICE workforce. Review of position descrip physical requirements, inability to control meal times, and necessity Enforcement Officers and non-Law Enforcement Officers.	ptions for the 1801 s	series noted potential b	parriers in regard
2019	OCDR coordinated with GSA and the Architectural Barriers Board to obtain information regarding the Architectural Barriers requirements and checklists for conducting Architectural Barriers walk throughs. Additionally, we coordinated with POCs in five (5) locations and conducted a total of seven (7) architectural barrier walkthroughs of ICE facilities in Washington, DC.			

06/01/2019

09/30/2019

09/30/2019

09/30/2020

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:	Reasonable Accommodations Staff has not r responsibilities, due to a high volume of RA			t their
Provide a brief narrative describing the condition at issue				
How was the condition recognized as a potential barrier	,			
STATEMENT OF BARRIER	Barrier Group			
GROUPS:	People with Disabilities			
BARRIER ANALYSIS:				
Provide a description of the step taken and data analyzed to determine cause of the conditio				
STATEMENT OF IDENTIFIED BARRIER:  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of tundesired condition.	An ineffective reasonable accommodation program,	, due insufficiently train	ned Reasonable Accor	mmodation Staff.
Objective	Provide specialized training for Reasonable Accome Date Objective Initiated  Target Date For Completion Of Objective	nmodation Coordinator	s during FY 2019.	
Responsible Offic	Als Lynn Dickson Disability Program Manager Rita Bhanot Acting Deputy Chief Robin Kilgore Deputy Assistant Director Stacie Jones Chief Diversity Officer Scott Lanum Assistant Director for Diversity and Co	Civil Rights		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020 Participat	in DEOMI training opportunities, when available.	No		
09/30/2019 DPM will	attend the EEOC Excel Training Conference	Yes		08/01/2019
	e Accommodation Coordinators will participate in ability Program Manager (Basics)	No		06/19/2019

No

No

Yes

No

06/15/2019

DPM will develop and provide in-house training for Reasonable

DPM will provide one-on-one training as needed to assist Reasonable Accommodation Coordinators in developing skills

Maintain contact with DEOMI registration staff regarding training opportunities, for non-DOD entities.

Accommodation Coordinators.

needed for processing RA cases

DPM will attend the FDR 2019 conference.

06/01/2019

09/30/2019

08/15/2019

Fiscal Year Accomplishments	
2019	Training was provided for the RA team via one-on-one training, conference, and webinar attendance. Contractors were provided training and written instruction for each assigned project.
2019	The Disability Program Manager and the Reasonable Accommodation Coordinator attended the EEOC Disability Program Manager Basics course.
2019	The Disability Program Manager prepared training developed and provide in-house training for Reasonable Accommodation Coordinators. Additionally, the Disability Program Manager met one-on-one with the Reasonable Accommodation Coordinator to discuss specific RA cases to further develop and enhance skills needed for processing RA cases.

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:		Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period?					
Provide a brief narrative describing the condition at issue.							
How was the condition recognized as a potential barrier?							
STATEMENT OF BARRIER GROUPS:		Barrier Group					
		People with Disabilities					
BARRIER ANALY	SIS:						
Provide a description of the steps taken and data analyzed to determine cause of the condition.							
STATEMENT OF IDENTIFIED BARRIER:		Insufficient resources for processing reasonable accommodation requests and implementation of the disability program.					
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.							
Objective		Leverage available resources for processing reasonable accommodation requests, and implementation of the disability program.  Date Objective Initiated  Target Date For Dec 31, 2021					
		Completion Of Objective					
Responsible Officials		S Scott Lanum Assistant Director for Diversity and Civil Rights					
•		Stacie Jones Chief Diversity Officer					
		Robin Kilgore Deputy Assistant Director					
		Rita Bhanot Acting Deputy Chief					
		Lynn Dickson Disability Program Manager					
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)		
09/30/2019	Coordinate with Project Manager for the current contract to facilitate the assignment of RA projects to available contractors.		Yes		09/30/2019		
09/30/2019	t	ional training for reasonable accommodation staff,	No		09/30/2019		
Fiscal Year		Accomplishments					
2019	Training was provided for the RA team via one-on-one training, conference and webinar attendance. Contractors were provided training and written instruction for each assigned project.						
2019	Assignments are being coordinated with the Project Manager and assigned to the current contractors to facilitate the completion of RA projects.						
<u> </u>			-	<u> </u>			

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:	The low number of selections of PWD and PWTD regarding new hires for Mission Critical Position; Attorney/General Attorney (0905), and Intelligence Research Specialist job series (0132) as compared to the goal(s) of 12% and 2%.
Provide a brief narrative describing the condition at issue.	
How was the condition recognized as a potential barrier?	
STATEMENT OF BARRIER	Barrier Group
GROUPS:	People with Disabilities
	People with Targeted Disabilities
BARRIER ANALYSIS:	
Provide a description of the steps	
taken and data analyzed to	
determine cause of the condition.	
STATEMENT OF IDENTIFIED BARRIER:	To date, a barrier has not been identified.
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	
Objective	To increase the number of PWD and PWTD selections (new hires) for Mission Critical Positions.
	Date Objective Oct 1, 2019 Initiated
	Target Date For Completion Of Objective
Responsible Officials	Lynn Dickson Disability Program Manager
	Rita Bhanot Acting Deputy Chief
	Deputy Assistant Director Robin Kilgore
	Stacie Jones Chief Diversity Officer
	Scott Lanum Assistant Director for Diversity and Civil Rights

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)		
06/30/2021	Draft an outreach plan in partnership with OHC to target these institutions.	No				
09/30/2020	Draft a plan of action to resolve identified barriers.	No				
08/30/2020	Conduct additional analysis to identify any potential barriers regarding Criminal Investigator Series 1811, and Intelligence Research Specialist Series 0132.	No				
09/30/2021	Develop marketing materials to be provided to the Disability Program Point of Contact at these institutions.					
11/30/2020	Implement plans of action to resolve identified barriers.	No				
01/31/2021	ODCR and OHC will share resources and participate in recruitment events for Gallaudet University and the National Technical Institute for the Deaf (NTID) at the Rochester Institute of Technology.	No				
03/30/2021	Develop a state by state list of Law Schools and their Disability Program Point of Contact.	No				
09/30/2019	Conduct additional analysis to identify any potential barriers regarding Attorney/General Attorney (0905).	No		12/31/2019		
09/30/2020	ODCR and OHC Office of Human Capital will share resources, including the utilization of Field Special Emphasis Program Managers at recruitment events.	No				
Fiscal Year	Accomplishments					
2019	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce.					
2019	The number of PWD and PWTD new hires for the General Inspection, Investigation, Enforcement and Compliance job series (1801) increased in FY 2019, resulting in the resolution of the triggers identified in FY 2018.					
2019	Additionally, the number of PWD and PWTD new hires for the Criminal Investigator job series (1811) increased in FY 2019, resulting in the resolution of the triggers identified in FY 2018.					

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?  STATEMENT OF BARRIER	The lower than expected participation of PWTD applicants and/or selectees for Career Development Programs.  **Barrier Group**
GROUPS:	People with Targeted Disabilities
BARRIER ANALYSIS:	
Provide a description of the steps taken and data analyzed to determine cause of the condition.	
STATEMENT OF IDENTIFIED BARRIER:	To date no barrier has been identified.
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	
Objective	Identify potential barriers to participation and enhance data gathering for PWTD participants for Career Development Programs.
	Date Objective Oct 1, 2019 Initiated
	Target Date For Completion Of Objective
Responsible Officials	Rita Bhanot Acting Deputy Chief
	Stacie Jones Chief Diversity Officer
	Lynn Dickson Disability Program Manager Robin Kilgore Deputy Assistant Director
	Scott Lanum Assistant Director for Diversity and Civil Rights

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
10/31/2019	Schedule a meeting with the ICE Chiefs of Staff office to discuss detail assignments and data gathering requirements.	No	12/31/2020		
09/30/2020	ICE Broadcast to workforce informing them that Reasonable Accommodations are available for individuals participating in Career Development programs.	No			
09/30/2021	Collaborate with OLCD to update the website regarding reasonable accommodations and ensure 508 compliance.	No			
09/30/2020	Disability Awareness month fair, to include community partner demonstrations, info sessions, and career development sessions.	No			
09/30/2019	Schedule a meeting with OLCD to discuss data gathering requirements.	No		03/27/2019	
11/30/2019	Schedule a meeting with OLCD to discuss Internship and Fellowship programs and data gathering requirements.	No	11/30/2020		
12/31/2019	Schedule a meeting with the PALMS point of contact to ensure information is available regarding reasonable accommodations.	No	09/30/2020		
12/31/2019	Review application for Leadership and Career Development programs to ensure it contains information regarding reasonable accommodations.	No		03/28/2019	
12/31/2019	Coordinate with OLCD to ensure all announcements contain information for requesting reasonable accommodation.	No		03/28/2019	
09/30/2020	Develop Reasonable Accommodation marketing materials that can be distributed by OLCD and other ICE Career Development programs, providing information on how to request a RA for participation in a Career Development program.	No			
Fiscal Year	Accomplish	ments			
2019	ODCR staff and OLCD staff discussed the need to provide reasonable	e accommodation in	formation for each of	OLCDs.	
2019	ODCR met with OLCD to discuss the requirements for data collection. As a result of that meeting, a means to provide ODCR with the needed data was developed.				
2019	ODCR staff and OLCD staff reviewed the application for OLCD pro reasonable accommodation.	grams and ensured it	t contains information	for requesting a	

STATEMENT OF ICE has a perceived trigger involving PWD among qualified internal applicants and/or selectees for						
CONDITION THAT TRIGGER FOR A	Γ WAS A	promotions to supervisory positions.				
POTENTIAL BARI	RIER:					
Provide a brief narrat describing the condit	I					
How was the condition recognized as a poter	I					
STATEMENT OF I	BARRIER	Barrier Group				
GROUPS:		People with Disabilities				
BARRIER ANALY	SIS:					
Provide a description taken and data analydetermine cause of the	zed to					
STATEMENT OF IDENTIFIED BAR	Applicant Flow Data is not available regarding Qualified Internal Applicants per grade level.					
the agency policy, pr or practice that has b	that has been ed to be the barrier of the					
Objective		Obtain applicant flow data for Qualified Internal App	licants.			
		Date Objective Oct 1, 2019 Initiated				
		Target Date For Completion Of Objective				
Respon	sible Officials	Scott Lanum Assistant Director for Diversity and Civil Rights				
		Lynn Dickson Disability Program Manager				
		Stacie Jones Chief Diversity Officer				
		Robin Kilgore Deputy Assistant Director Rita Bhanot Acting Deputy Chief				
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
09/30/2020	Conduct barri of updated av	ier analysis to identify potential triggers, upon receipt ailable.	No			
09/30/2019	Monitor upda Applicant Da	tes regarding the availability of updated Internal ta.	No		09/30/2019	
Fiscal Year		Accomplish	ments			
2019	Applicant Flo promotions.	low Data was obtained via the USA Staffing portal which provides information regarding internal competitive				
2019	employees the physical requ	rier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for ployees throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers in regard to sical requirements, inability to control meal times, and necessity to maintain a current driver's license, for both Law orcement Officers and non-Law Enforcement Officers.				

STATEMENT OF CONDITION THAT TRIGGER FOR A POTENTIAL BARK		The higher than average rate of voluntary and involuntary separations among PWDs.				
Provide a brief narrat describing the conditi						
How was the condition recognized as a poten						
STATEMENT OF E	BARRIER	Barrier Group				
GROUPS:		People with Disabilities				
BARRIER ANALY	SIS:					
Provide a description taken and data analyz determine cause of th	zed to					
STATEMENT OF IDENTIFIED BAR	RIER:	To date no barrier has been identified.				
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.						
Objective		Lower the rate of voluntary and involunta  Date Objective Initiated  Target Date For Completion Of Objective	ary separations	s among PWDs.		
Respons	sible Officials	Lynn Dickson Disability Program Manag	ger			
_		Rita Bhanot Acting Deputy Chief	,			
		Scott Lanum Assistant Director for Diver	rsity and Civil	Rights		
		Robin Kilgore Deputy Assistant Director				
		Stacie Jones Chief Diversity Officer				
Target Date (mm/dd/yyyy)		Staffing & Date		Completion Date (mm/dd/yyyy)		
09/30/2020	Conduct barr	er analysis to identify any potential barriers	s.	No		
03/30/2021	Schedule a ro	nedule a round table with Managers/Supervisors No				
12/31/2019	Schedule a meeting with OHC to discuss the status of No 12/31/2020 implementation of exit interviews.					
01/31/2021	Implement pl	ans of action to resolve identified barriers.		No		
12/31/2020	Draft a plan o	f action to resolve identified barriers.		No		
Fiscal Year			Accomplishm	nents		

Zilloi Cellielli						
STATEMENT OF CONDITION THA' TRIGGER FOR A POTENTIAL BAR		The lower than expected representation of PWD and PWTD whom received time off awards of 11-20 hours, 21-30 hours, and 31-40 hours; as well as cash awards of \$1,000-\$1999, \$2,000-\$2,999, \$3,000-\$3,999. \$4,000-\$4,999, and \$5,000-\$5,999.				
Provide a brief narrated describing the condit						
How was the condition recognized as a poter						
STATEMENT OF I	BARRIER	Barrier Group				
GROUPS:		People with Disabilities				
		People with Targeted Disabilities				
BARRIER ANALY	SIS:					
Provide a description taken and data analy determine cause of the	zed to					
STATEMENT OF IDENTIFIED BAR	RIER:	To date no barrier has been identified.				
the agency policy, proor practice that has b	rovide a succinct statement of the agency policy, procedure that has been tetermined to be the barrier of the the adesired condition.					
Objective		Identify and resolve potential barriers regarding PWI	and PWTD within t	he awards programs.		
		Date Objective Oct 1, 2019 Initiated		1 0		
		Target Date For Completion Of Objective				
Respon	sible Officials	Lynn Dickson Disability Program Manager				
		Stacie Jones Chief Diversity Officer				
		Scott Lanum Assistant Director for Diversity and Civil Rights				
		Robin Kilgore Deputy Assistant Director				
		Rita Bhanot Acting Deputy Chief				
Target Date (mm/dd/yyyy)		Planned Activities  Sufficient Modified Completion Staffing & Date Date Funding (mm/dd/yyyy) (mm/dd/yyyy)				
09/30/2019	Conduct addi	tional analysis to identify any potential barriers.	No	09/30/2020		
06/30/2020	Implement pl	ans of action to resolve identified barriers.	No			
12/31/2020	Conduct a foo	onduct a focus group with employees.  Yes				
09/30/2020	Conduct a foo	onduct a focus group with supervisors.  Yes				
01/31/2020	Establish a pl	an of action to resolve identified barriers.	No	01/31/2021		
Fiscal Year		Accomplish	ments			
2019	Barrier analy	sis was implemented in FY 2019 and will continue in F				
		Barrier analysis was implemented in 1.1.2017 and with continue in 1.1.2020.				

STATEMENT OF ICE has a perceived trigger involving PWD and PWTD among employees promoted to mission							
CONDITION THA TRIGGER FOR A POTENTIAL BAR		critical occupations.					
Provide a brief narra describing the condit							
How was the condition recognized as a poten							
STATEMENT OF	BARRIER	Barrier Group					
GROUPS:		People with Disabilities					
		People with Targeted Disabilities					
BARRIER ANALY	SIS:						
Provide a description taken and data analy determine cause of t	zed to						
STATEMENT OF	DIED.	Data is not available for Qualified Internal Applicants					
Provide a succinct st the agency policy, por practice that has be determined to be the undesired condition.	tatement of rocedure been barrier of the						
Objective		Obtain annlicent flow date for evalified internal annil					
Objective		Obtain applicant flow data for qualified internal applicants.  Date Objective Oct 1, 2019					
		Initiated					
		Target Date For Completion Of Objective					
Responsible Officials		Rita Bhanot Acting Deputy Chief Stacie Jones Chief Diversity Officer Robin Kilgore Deputy Assistant Director					
	1	Scott Lanum Assistant Director for Diversity and Civ		I			
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)		
09/30/2019	Monitor upda Applicant Da	ites regarding the availability of updated Internal ta.	No		09/30/2019		
09/30/2020	Coordinate with the USA Staffing point of contact to determine if a custom report can be developed for ICE that would provide the internal competitive promotions information broken down by grade level.						
09/30/2020	Conduct barri available.	Conduct barrier analysis to determine if triggers exist, once data is No					
Fiscal Year		Accomplishments					
2019	Applicant Flo	cant Flow Data was obtained via the USA Staffing portal which provides information regarding internal competitive					
2019	Barrier analysemployees the physical requirement	omotions.  Arrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for analysis throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers in regard to anysical requirements, inability to control meal times, and necessity to maintain a current driver's license, for both Law inforcement Officers and non-Law Enforcement Officers.					

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?  STATEMENT OF BARRIER	The lower than expected participation of PWD applicants and/or selectees for Career Development Programs.  **Barrier Group**
GROUPS:	People with Disabilities
BARRIER ANALYSIS:	
Provide a description of the steps taken and data analyzed to determine cause of the condition.	
STATEMENT OF IDENTIFIED BARRIER:	To date no barrier has been identified.
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	
Objective	Identify potential barriers to participation and enhance data gathering for PWD participants for Career Development Programs.
	Date Objective Oct 1, 2019 Initiated
	Target Date For Completion Of Objective
Responsible Officials	Lynn Dickson Disability Program Manager
	Rita Bhanot Acting Deputy Chief
	Stacie Jones Chief Diversity Officer Robin Kilgore Deputy Assistant Director
	Scott Lanum Assistant Director for Diversity and Civil Rights

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)		
09/30/2020	Develop RA marketing materials that can be distributed by OLCD and other ICE Career Development programs, providing information on how to request a RA for participation in a Career Development program.	No				
09/30/2019	Schedule a meeting with the Office of Leadership and Career Development (OLCD) to review data gathering requirements.	No		03/27/2019		
10/31/2019	Schedule a meeting with the ICE Chiefs of Staff office to discuss detail assignments and data gathering requirements.	No	12/31/2020			
12/31/2019	Schedule a meeting with the PALMS point of contact to ensure information is available regarding reasonable accommodations.	No	09/30/2020			
09/30/2020	ICE Broadcast to workforce informing them that Reasonable Accommodations are available for individuals participating in Career Development programs.	No				
11/30/2019	Schedule a meeting with the Office of Leadership and Career Development to discuss Internship and Fellowship programs and data gathering requirements.	No	11/30/2020			
09/30/2021	Collaborate with OLCD to update the website regarding reasonable accommodations and ensure 508 compliance.	No				
12/31/2019	Review application for Leadership and Career Development programs to ensure it contains information regarding requesting a reasonable accommodation.	No		03/28/2019		
12/31/2019	Coordinate with Leadership and Career Development to ensure all announcements contain instructions for requesting a reasonable accommodation.	No		03/28/2019		
09/30/2020	Disability Awareness month fair, to include community partner demonstrations, info sessions and career development sessions.	No				
Fiscal Year	Accomplish	ments				
2019	ODCR met with OLCD to discuss the requirements for data collection. As a result of that meeting, a means to provide ODCR with the needed data was developed.					
2019	ODCR staff and OLCD staff discussed the need to provide reasonable accommodation information for each of OLCDs.					
2019	ODCR staff and OLCD staff reviewed the application for OLCD proreasonable accommodation.	ograms and ensured it	t contains information	for requesting a		

STATEMENT OF CONDITION THA TRIGGER FOR A POTENTIAL BAR	T WAS A	ICE has a perceived trigger involving PWTD among qualified internal applicants and/or selectees for promotions to supervisory positions.				
Provide a brief narrat describing the condit						
How was the condition recognized as a poter						
STATEMENT OF I	BARRIER	Barrier Group				
GROUPS:		People with Targeted Disabilities				
BARRIER ANALY	SIS:					
Provide a description of the steps taken and data analyzed to determine cause of the condition.						
STATEMENT OF IDENTIFIED BAR						
Provide a succinct st the agency policy, pi or practice that has b determined to be the undesired condition.	rocedure been	redure n				
Objective		Obtain applicant flow data for Qualified Internal App	licants.			
		Date Objective Oct 1, 2019 Initiated				
		Target Date For Completion Of Objective				
Respon	sible Officials	Lynn Dickson Disability Program Manager Rita Bhanot Acting Deputy Chief Robin Kilgore Deputy Assistant Director Stacie Jones Chief Diversity Officer Scott Lanum Assistant Director for Diversity and Civ	vil Rights			
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
09/30/2019	Monitor upda Applicant Da	ites regarding the availability of updated Internal ta.	No		09/30/2019	
09/30/2020	Conduct barri of updated av	er analysis to identify potential triggers, upon receipt ailable.	No			
Fiscal Year		Accomplish	ments			
2019	employees the physical requ	lysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers in regard to quirements, inability to control meal times, and necessity to maintain a current driver's license, for both Law at Officers and non-Law Enforcement Officers.				
2019	Applicant Flo promotions.	w Data was obtained via the USA Staffing portal whic	h provides information	on regarding internal	competitive	

STATEMENT OF CONDITION THA' TRIGGER FOR A POTENTIAL BARI		The higher than average rate of voluntary and involuntary separations among PWTDs.				
Provide a brief narrat describing the conditi						
How was the condition recognized as a potential						
STATEMENT OF I	BARRIER	Barrier Group				
GROUPS:		People with Targeted Disabilities				
BARRIER ANALY	SIS:					
Provide a description taken and data analyzed determine cause of the	zed to					
STATEMENT OF IDENTIFIED BAR	RIER:	To date no barrier has been identified.				
the agency policy, pr or practice that has b	rovide a succinct statement of the agency policy, procedure r practice that has been etermined to be the barrier of the indesired condition.					
Objective		Lower the rate of voluntary and involuntary separation  Date Objective   Oct 1, 2019   Initiated   Target Date For   Dec 31, 2021   Completion Of	ons among PWDs.			
		Objective				
Respons	sible Officials	Rita Bhanot Acting Deputy Chief Lynn Dickson Disability Program Manager Robin Kilgore Deputy Assistant Director Stacie Jones Chief Diversity Officer Scott Lanum Assistant Director for Diversity and Ci	vil Rights			
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
12/31/2019	Schedule a meeting with the Office of Human Capital to discuss the status of implementation of exit interviews.  No 12/31/2020					
12/31/2020	Draft a plan of action to resolve identified barriers.					
03/30/2021						
09/30/2020	Conduct barr	ier analysis to identify any potential barriers.	No			
01/31/2021	Implement pl	ans of action to resolve identified barriers.	No			
Fiscal Year		Accomplish	hments			

STATEMENT OF CONDITION THAT WA TRIGGER FOR A POTENTIAL BARRIER	AS A	The lower than expected representation of PWTD whom received Quality Step Increases in FY 2019.			
Provide a brief narrative describing the condition at	t issue.				
How was the condition recognized as a potential b	parrier?				
STATEMENT OF BARK	RIER	Barrier Group			
GROUPS:		People with Targeted Disabilities			
BARRIER ANALYSIS:					
Provide a description of th taken and data analyzed to determine cause of the cor	)				
STATEMENT OF IDENTIFIED BARRIES	R:	To date no barrier has been identified.			
Provide a succinct stateme the agency policy, procedu or practice that has been determined to be the barrie undesired condition.	a succinct statement of cy policy, procedure ce that has been ned to be the barrier of the				
Objective		Identify and resolve potential barriers regarding PWT  Date Objective Initiated  Target Date For Completion Of Objective	TD in regard to receiv	ing Quality Step Incr	eases.
Responsible	Officials	Rita Bhanot Acting Deputy Chief Scott Lanum Assistant Director for Diversity and Civil Rights Stacie Jones Chief Diversity Officer Lynn Dickson Disability Program Manager			
Target Date (mm/dd/yyyy)	Staffing & Date Date			Completion Date (mm/dd/yyyy)	
06/30/2021 Impl	lement pla	ans of action to resolve identified barriers.	No		
01/31/2021 Cond	duct a foc	eus group with employees.	Yes		
03/30/2020 Cond	Conduct additional analysis to identify any potential barriers.				
	1 Establish a plan of action to resolve identified barriers. No				
09/30/2020 Cond	Conduct a focus group with supervisors.  Yes				
Fiscal Year		Accomplish	ments		

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:	ICE has a perceived trigger involving PWD among qualified internal applicants and/or selectees for promotions in GS-13 to SES.			
Provide a brief narrative describing the condition at issue.				
How was the condition recognized as a potential barrier?				
STATEMENT OF BARRIER GROUPS:    Barrier Group   People with Disabilities				
BARRIER ANALYSIS:				
Provide a description of the steps taken and data analyzed to determine cause of the condition.				
STATEMENT OF IDENTIFIED BARRIER:	Applicant flow data is not available specific to qualific	ed internal applicants		
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	ne agency policy, procedure r practice that has been etermined to be the barrier of the			
Objective	Obtain applicant flow data for qualified internal applicants.  Date Objective Initiated  Target Date For Completion Of Objective			
Responsible Offici	Robin Kilgore Deputy Assistant Director Stacie D. Jones Chief Diversity Officer Scott Lanum Assistant Director for Diversity and Civ Lynn Dickson Disability Program Manager Rita Bhanot Acting Deputy Chief	vil Rights		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020 Conduct b of updated	rrier analysis to identify potential triggers, upon receipt available.	No		
11	Monitor updates regarding availability of updated Internal No 09/30/2019 Applicant Data.			
Fiscal Year	Accomplish	nments		
2019 Barrier and	alysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for a throughout the ICE workforce.			
2019 Applicant promotion	Flow Data was obtained via the USA Staffing portal whic .	h provides information	on regarding internal	competitive

STATEMENT OF CONDITION THAT TRIGGER FOR A POTENTIAL BARK	tot promotions to G5-13 to BES.				
Provide a brief narrative describing the condition at issue.					
How was the condition recognized as a potential	I				
STATEMENT OF E GROUPS:	BARRIER	Barrier Group People with Targeted Disabilities			
BARRIER ANALY	SIS:				
Provide a description taken and data analyz determine cause of the	zed to				
STATEMENT OF IDENTIFIED BAR	RIER:	Applicant flow data is not available specific to qualifie	ed internal applicants		
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.					
Objective	Obtain applicant flow data for qualified internal applicants.  Date Objective Initiated  Target Date For Completion Of Objective				
Responsible Officials		Stacie Jones Chief Diversity Officer Robin Kilgore Deputy Assistant Director Scott Lanum Assistant Director for Diversity and Civ Lynn Dickson Disability Program Manager Rita Bhanot Acting Deputy Chief	ril Rights		
Target Date (mm/dd/yyyy)	Planned Activities  Sufficient Modified Completion Staffing & Date Date Funding (Modified Date (mm/dd/yyyy) (mm/dd/yyyy)				Date
09/30/2019	Monitor upda Applicant Da	Monitor updates regarding the availability of updated Internal No 09/30/2019			
09/30/2020	Conduct barrier analysis to identify potential triggers, upon receipt of updated available.				
Fiscal Year		Accomplish	ments		
2019	Applicant Flo	ow Data was obtained via the USA Staffing portal which		on regarding internal of	competitive
2019	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce.				

STATEMENT OF CONDITION THAT TRIGGER FOR A POTENTIAL BARR		The lower than anticipated rate of selectees from regard to GS – 13, GS-14 and SES.	om the qualified ap	pplicant pool for P	WD new hires in
Provide a brief narrative describing the condition at issue.					
How was the condition recognized as a potential	1				
STATEMENT OF B	ARRIER	Barrier Group			
GROUPS:		People with Disabilities			
BARRIER ANALYS	SIS:				
Provide a description taken and data analyz determine cause of th	ed to				
STATEMENT OF IDENTIFIED BARRIER:		Physical requirement barriers have been identified in have been identified at ICE facilities in Washington, I		ement positions. Arcl	nitectural barriers
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.					
Objective		To identify and resolve potential barriers, resulting in SES.	an Increase in the nu	umber of PWD select	ees for GS – 13 to
		Date Objective Oct 1, 2019 Initiated			
		Target Date For Completion Of Objective			
Respons	sible Officials	s Lynn Dickson Disability Program Manager			
		Robin Kilgore Deputy Assistant Director			
		Stacie D. Jones Chief Diversity Officer			
		Rita Bhanot Acting Deputy Chief			
		Scott Lanum Assistant Director for Diversity and Civ	vil Rights		
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/2020	Implement plans of action to resolve identified barriers.	No		
09/30/2020	Develop marketing materials to provide to colleges whom provide career development services for individuals with disabilities.	No		
09/30/2020	Develop a list of state by state local disability agencies whom serve potential job candidates.	No		
09/30/2019	Develop reasonable accommodation materials to be provided to perspective job applicants at community outreach events.	No	06/30/2020	
12/31/2019	Coordinate with SPPC and Recruiting to provide information regarding reasonable accommodation to perspective job applicants at community events.	No	09/30/2020	
09/30/2019	Conduct additional analysis to identify any potential barriers.	No	09/30/2020	
01/31/2020	Draft a plan of action to resolve identified barriers.	No	12/31/2020	

Fiscal Year	Accomplishments
	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers regarding physical requirements, inability to control meal times, and necessity to maintain a current driver's license, for both Law Enforcement Officers and non-Law Enforcement Officers.

09/30/2020

01/31/2020

09/30/2019

STATEMENT OF CONDITION THAT TRIGGER FOR A POTENTIAL BARI		The lower than anticipated rate of selectees from the qualified applicant pool for PWTD new hires from $GS-13$ to $SES$ .				
Provide a brief narrat describing the conditi						
How was the condition recognized as a potential						
STATEMENT OF I	BARRIER	Barrier Group				
GROUPS:		People with Disabilities				
BARRIER ANALY	SIS:					
Provide a description taken and data analyzed determine cause of the	zed to					
STATEMENT OF IDENTIFIED BAR	RIER:	Physical requirement barriers have been identified in	regard to Law Enforc	ement Officers.		
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.						
Objective		To identify and resolve potential barriers, resulting SES.  Date Objective Initiated Target Date For Completion Of	n an Increase in the n	umber of PWD select	ees for GS – 13 to	
		Objective				
Responsible Officials		Robin Kilgore Deputy Assistant Director Scott Lanum Assistant Director for Diversity and C Rita Bhanot Acting Deputy Chief Stacie Jones Chief Diversity Officer Lynn Dickson Disability Program Manager	ivil Rights			
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
09/30/2020	Develop a lis	t of state by state disability agencies whom serve candidates.	No			
09/30/2020		keting materials to provide to colleges whom provide opment services for individuals with disabilities.	No			
09/30/2019 Conduct additional analysis to identify any potential barriers. No 09/30/2020						
09/30/2020	Implement plans of action to resolve identified barriers.					

No

No

No

12/31/2020

09/30/2020

Develop reasonable accommodation materials to be provided to

Coordinate with SPPC and Recruiting to provide information regarding reasonable accommodation to perspective job applicants

perspective job applicants at community events.

at community events.

Establish a plan of action to resolve identified barriers.

Fiscal Year	Accomplishments
	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers regarding physical requirements, inability to control meal times, and necessity to maintain a current driver's license, for both Law Enforcement Officers and non-Law Enforcement Officers.

STATEMENT OF CONDITION THA' TRIGGER FOR A POTENTIAL BARI					
Provide a brief narrat describing the conditi	1				
How was the condition recognized as a potential	1				
STATEMENT OF I	BARRIER	Barrier Group			
GROUPS:		People with Disabilities			
BARRIER ANALY	SIS:				
Provide a description taken and data analyzed determine cause of the	zed to				
STATEMENT OF IDENTIFIED BAR	RIER:	Physical requirement barriers have been identified in have been identified in ICE facilities in Washington, I		ement positions. Arch	nitectural barriers
Provide a succinct st the agency policy, pr or practice that has b determined to be the undesired condition.	ocedure een				
Objective		To identify and resolve potential barriers resulting in to supervisory positions.  Date Objective Initiated  Target Date For Completion Of Objective	an Increase in the nu	mber PWTD selectee	s among new hires
Respon	sible Officials	Lynn Dickson Disability Program Manager			
		Rita Bhanot Acting Deputy Chief			
		Stacie D. Jones Chief Diversity Officer			
		Robin Kilgore Deputy Assistant Director Scott Lanum Assistant Director for Diversity and Civ	vil Rights		
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/2020	Implement pl	ans of action to resolve identified barriers.	No		
01/31/2020	Draft a plan o	of action to resolve identified barriers.	No	12/31/2020	
09/30/2019	Conduct addi	tional analysis to identify any potential barriers.	No	09/30/2020	
Fiscal Year		Accomplish	ments		
2019	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers in regard to physical requirements, inability to control meal times, and necessity to maintain a current driver's license, for both Law Enforcement Officers and non-Law Enforcement Officers.				

STATEMENT OF CONDITION THAT TRIGGER FOR A POTENTIAL BARK	TION THAT WAS A ER FOR A					
Provide a brief narrative describing the condition at issue.						
How was the condition recognized as a poten						
STATEMENT OF E	BARRIER	Barrier Group				
GROCIS.		People with Targeted Disabilities				
BARRIER ANALY	SIS:					
Provide a description taken and data analyz determine cause of th	zed to					
STATEMENT OF IDENTIFIED BAR	RIER:	Physical requirement barriers have been identified in have been identified in ICE Facilities in Washington,		ement positions. Arch	nitectural barriers	
Provide a succinct state agency policy, pror practice that has be determined to be the undesired condition.	ocedure een					
Objective		To identify and resolve potential barriers resulting in to supervisory positions.  Date Objective Initiated Target Date For Completion Of Objective	an increase in the nu	mber PWTD selectee	s among new hires	
Responsible Officials		Rita Bhanot Acting Deputy Chief Scott Lanum Assistant Director for Diversity and Civ Robin Kilgore Deputy Assistant Director Lynn Dickson Disability Program Manager Stacie Jones Chief Diversity Officer	vil Rights			
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
09/30/2019	Conduct addi	tional analysis to identify any potential barriers.	No	09/30/2020		
01/31/2020	Draft a plan of action to resolve identified barriers. No 12/31/2020					
06/30/2020	Implement pl	ans of action to resolve identified barriers.	No			
Fiscal Year		Accomplish	ments			
2019	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers in regard to physical requirements, inability to control meal times, and necessity to maintain a current driver's license, for both Law Enforcement Officers and non-Law Enforcement Officers.					

STATEMENT OF CONDITION THA TRIGGER FOR A POTENTIAL BAR	after two years of satisfactory service.				
Provide a brief narra describing the condi					
How was the conditi recognized as a pote					
STATEMENT OF	BARRIER	Barrier Group			
GROUPS:		People with Disabilities			
		People with Targeted Disabilities			
BARRIER ANALY	YSIS:				
Provide a descriptio	n of the stens				
taken and data analy					
determine cause of t	the condition.				
STATEMENT OF IDENTIFIED BAR	RRIER:	To date no barrier has been identified.			
Provide a succinct s the agency policy, p or practice that has be determined to be the undesired condition	rocedure been barrier of the				
Objective		All Schedule A employees eligible for conversion, will be converted into the competitive service after 2 years of satisfactory service.			
		Date Objective Oct 1, 2019 Initiated			
		Target Date For Completion Of Objective			
Responsible Officials		Deputy Assistant Director Robin Kilgore Stacie Jones Chief Diversity Officer Assistant Director for Diversity and Civil Rights Scot Rita Bhanot Acting Deputy Chief Lynn Dickson Disability Program Manager	tt Lanum		
Target Date (mm/dd/yyyy)		Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/2020	Revise ODCI	R supervisor and manager training to include egarding the conversion of Schedule A employees.	No		
04/30/2020	Coordinate with OHC to ensure eligible Schedule A candidates, whom have not been converted, are converted to competitive service.				
10/31/2019	Identify the S to competitiv	chedule A employees whom have not been converted e service.	No		03/04/2019
12/31/2019	Work with the ensure the time	e RRPM to develop a tracking system to monitor and nely conversion of future Schedule A employees.	No	12/31/2020	
09/30/2020	Coordinate with OHC to ensure the supervisor of each Schedule A employee who has not been converted is contacted, to determine why the employee was not converted.				
09/30/2019	Schedule a m Schedule A e	neeting with RRPM to discuss the conversion of mployees.	No	09/30/2020	
Fiscal Year		Accomplish	ments		
		T ·			

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

ICE was unable to conduct the final architectural barrier walk-through in Washington, DC due to scheduling issues. ICE anticipates completing this walk-through by March 31, 2020. Architectural barrier walkthroughs were further delayed in Washington DC and Baltimore due to COVID 19. Architectural barrier walkthroughs scheduled for FY 2020 will be rescheduled for FY 2021. Barrier analysis was initiated in FY 2019. However, due to the limited number of RA staff and Contractors available to conduct the analysis, it will continue and be completed in FY 2020.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

The completion of the Architectural Barrier walkthroughs provided valuable information which will be used to establish the plan for resolving the identified barriers. Barriers identified included issues such as absence of electronic door openers, inaccessible kitchen areas or pantries, inaccessible file cabinets, and inaccessible maps or notices for visually impaired employees. The training provided resulted in a more confident and knowledgeable RA team. As a result of the training provided, the Reasonable Accommodation team is more confident and skilled in responding to inquiries and processing reasonable accommodation requests. Additionally, the training has provided a Reasonable Accommodation Coordinator with the knowledge of how and where to research Reasonable Accommodation (RA) information, which in turn continues to increase knowledge and skill. Coordinating with the Program Manager for the current contract facilitated the assignment of RA projects to available contractors. Additionally, this resulted in the Program Manager having the opportunity to identify the Contractor with the knowledge and skill to complete the task. An additional benefit that occurred during FY 2019, was the opportunity for a Contractor to expand her knowledge and skill in conducting research and completing projects for the RA team. The availability of Applicant Flow Data from USA Staffing provided ICE the ability to review and determine whether the information provided is sufficient for conducting the needed analysis of the ICE workforce, as well as determining next steps to obtain additional data. The availability of Applicant Flow Data from USA Staffing provided ICE the ability to review and determine whether the information provided is sufficient for conducting the needed analysis of the ICE workforce, as well as determining next steps to obtain additional data. The meeting with OLCD established the protocols and manner in which data will be provided to ODCR.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

ODCR will be preparing the plan for addressing areas identified during the walkthroughs. Barrier analysis will continue in FY 2020 and transition to a review of policies and procedures. Training provided resulted in a more confident and knowledgeable RA team. ODCR will continue to monitor available training via DEOMI during FY 2020. Barrier analysis will continue in FY 2020 in order to identify potential barriers regarding the Attorney/General Attorney series (0905), and Intelligence Research Specialist series (0132). Applicant Flow Data was obtained via the USA Staffing portal which provides information regarding internal competitive promotions. However, although ICE was able to obtain this data, it did not assist us in eliminating the barrier. The information available provides information regarding internal competitive promotions across the workforce and not broken down by grade level. The Disability Program Manager will coordinate with the USA Staffing point of contact to determine if a custom report can be developed for ICE that would provide the internal competitive promotions information broken down by grade level. Applicant Flow Data was obtained via the USA Staffing portal, which provides information regarding internal competitive promotions. However, although ICE was able to obtain this data, it did not assist us in eliminating the barrier. The information available provides information regarding internal competitive promotions across the workforce and not broken down by grade level. The Disability Program Manager will coordinate with the USA Staffing point of contact to determine if a custom report can be developed for ICE that would provide the internal competitive promotions information broken down by grade level. ODCR will continue to evaluate data provided by OLCD to determine the PWD and PWTD participation rates and determine next steps to evaluate potential barriers